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July 15, 2020

VIA ECF

United States District Court for
The Southern District of New York
40 Foley Square, Room
2203 New York, NY 10007
Attention: The Honorable Judge Ronnie Abrams

Re: 632 Metacom Inc., et al v. Certain Underwriters at Lloyd's, et al;
Civil No.: 20-cv-03905
Related Case: 20-cv-03107
Our File No: 960.002

Dear Judge Abrams:

Our office represents the defendant, Certain Underwriters at Lloyd's, London Subscribing to Policy Number XSZ146282 ("Lloyd's") in the above-entitled action.

Please permit this correspondence to serve as a joint request to adjourn both the filing of the joint submission letter with case management plan and scheduling order currently due July 17, 2020, as well as the initial status conference scheduled for July 24, 2020. This is the first request to adjourn the joint submission and initial status conference. Plaintiffs' consent to said request.

This matter pertains to an alleged putative class action, wherein the named Plaintiff is a Warren, Rhode Island business that seeks insurance coverage under a commercial property policy for alleged loss of business income related to their businesses in Warren, Rhode Island. Lloyd's executed a Waiver of Service of Summons dated *May 29, 2020*. Lloyd's response to the Complaint is currently due July 28, 2020.

Counsel for the Parties have conferred and discussed that Lloyd's will be filing a pre-answer motion and the Plaintiffs are contemplating filing an amended complaint. Therefore, the parties request that the initial conference be adjourned until September 1, 2020.¹

¹ A similar request was submitted to the Court in the related action, Civil No. 20-cv-03107.

United States District Court, Southern District of New York
Attention: The Honorable Judge Ronnie Abrams
July 15, 2020
Re: 632 Metacom, Inc., et al v. Certain Underwriters at Lloyd's, et al;
Civil No.: 20-cv-3905

Thank you for your consideration.

Very truly yours,

AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP


PETER J. FAZIO /s/

Peter J. Fazio

Cc: All Parties Via ECF

Application granted. The initial conference is hereby adjourned to September 4, 2020 at 10:30 AM. The parties shall file the joint letter and proposed case management plan and scheduling order no later than August 28, 2020.

SO ORDERED.



Hon. Ronnie Abrams
7/16/2020